

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

KASSANDRA ELEJARZA

Plaintiff,

v.

GOODLEAP, LLC, TRISMART SOLAR, LLC,  
CALEB PHILLIPS and VIVINT, LLC

Defendant.

Civil Action No. 7:25-cv-99

**DEFENDANT TRISMART SOLAR, LLC'S  
MOTION TO APPEAR REMOTELY AT INTIAL CONFERENCE**

Comes now Defendant TriSMART Solar, LLC, and moves for permission from the Court for its counsel to appear at the **Initial Conference** scheduled for **May 6, 2025 at 3:30 P.M.** remotely by telephone or via video conference.

Undersigned counsel is located at Defendant's office in Houston, Texas. In person attendance would require a full day of travel to and from McAllen, Texas. Counsel can more effectively and economically represent his client by appearing remotely. Counsel would therefore request that he be allowed to appear remotely.

Respectfully submitted,

**TRISMART SOLAR, LLC**

/s/ *Timothy R. Allen*

**TIMOTHY R. ALLEN**

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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record pursuant to the Federal Rules of Civil Procedure 5(b)(2)(E) on April 28, 2025.

/s/ *Timothy R. Allen*

**TIMOTHY R. ALLEN**